

Remarks/Arguments

Claims 2, 5 and 7 have been cancelled; claim 1, 4, and 6 have been amended; and new claims 21-29 have been added. Claims 13-20 have been withdrawn. Claims remaining in consideration are 1, 3, 4, 6, 8-12, and 21-30.

Amendments Unrelated to Patentability

The specification has been amended to correct inadvertent errors. The paragraph beginning on page 4, line has been amended to replace "contract" with "contact." The paragraph beginning on page 5, line 3 has been amended to eliminate duplicate wording. The paragraph beginning on page 5, line 25 and paragraph beginning on page 15, line 6 have been amended to replace "contract" with "contact."

Similarly, claims 1, 3, 4, and 6 have been amended to replace "contract" with "contact."

These corrections are not related to patentability and no new matter has been added by this amendment.

Discussion of Cited References

In contrast to the present invention, the cited references disclose monolithic contact strips. As discussed by the Applicant on page 3, line 29 through page 4, line 5, these monolithic contact strip have two disadvantages. First, the monolithic contact strips are prone to cracking. Second, the monolithic contact strips do not substantially contact the entire surface area of the transducer.

In U.S. Patent 4,849,668 to Crawley, Kapton or polyimide foils are used for isolating the transducer. An integral compound between the insulation and the conductive material cannot be achieved. The transducer is contacted by thin monolithic contact strips that are vapor deposited or bonded. The foils disadvantageously cover the electrodes only partially and are susceptible to cracks.

In U.S. Patent 4,857,887, foils disadvantageously cover the electrodes only partially and do not enable substantially covering of the electrodes of the transducers. Further, the monolithic foils are susceptible to cracks.

U.S. Patent 5,894,651 draws attention to the mounting of the wires to the ceramic transducer before the step of encapsulation. Thus, contacting the electrode over a large surface and with high reliability is not guaranteed.

In U.S. Patent 6,420,819 to Lazarus, foils are also used comprising etched copper contact strips. The problems are the same as mentioned in U.S. Patent 4,857,887 and 4,849,668.

In contrast to the references, woven semifinished products, such as very thin copper wires, may be used for contacting the electrodes of the transducer. The conductive copper nets are molded in a resin matrix in the process of manufacturing. These conductive nets are more elastic than monolithic contact strips because of their weaved character. This results in increased reliability of the electromechanical functional module for an interruption of the conductive net does not impair the function of the electromechanical functional module.

Claim rejection

Claims 1-12 are rejected under 35 U.S.C. 103(a) as being unpatentable over Iten (4,857,887) or Lazarus (6,420,819) in view of Dvorsky (5,894,651) or Crawley (4849,668). For a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either within the reference or in the knowledge generally available to one of ordinary skill in the art, to modify the reference teachings. See MPEP 2143. Second, there must be a reasonable expectation of success. *Id.* Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. *Id.*

The cited references cannot render obvious the claims because they do not teach or suggest every claim limitation. All of the claims specify upper and lower woven elastic contact strips. The woven elastic contact strips are integrally connected to the isolating fiber cover layers and cover the electrodes of the electromechanical transducer almost completely (substantially). Thus, it is ensured that in the case of a break of the ceramic transducer, all pieces of the broken transducer are still controlled. Hence, function and efficiency of the transducer are maintained. The cited references do not teach this claim limitation. Because the cited references do not teach this claim limitation, claims 1, 3, 4, 6, 8-12, and 21-29 are

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deemed non-obvious. Accordingly, Applicant respectfully requests that this claim rejection be withdrawn.

Furthermore, the Office Action alleges that specific wire mesh and woven fabric electrode materials are known per se. Applicant respectfully disagrees with this assertion and, as required by MPEP 2144.03, demands the production of authority for this statement. Applicant avers that woven elastic electric contact strips are not known in the art related to electromechanical functional modules of the type claimed.

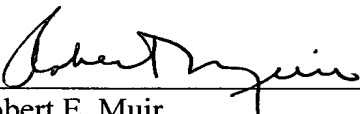
Additionally, the Office Action does not cite any suggestion or motivation for combining the references. The mere fact that the references can be combined does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination. See MPEP 2143.01.

Therefore, Applicant respectfully requests that the claim rejections under 35 U.S.C. § 103(a) be withdrawn.

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For the reasons stated above, Applicant submits that the application is now in condition for allowance. Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,
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